

Hearing Date and Time: July 15, 2009 at 10:00 a.m. Prevailing Eastern Time  
Objection Deadline and Time: July 10, 2009 at 4:00 p.m. Prevailing Eastern Time

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	:
	:
Debtors.	:
-----X	

Chapter 11  
Case No. 08-13555-JMP

**NOTICE OF MOTION FOR RELIEF FROM DERIVATIVE PROCEDURES ORDERS  
AND OBJECTION TO DEBTORS' MOTION FOR AN ORDER PURSUANT TO  
SECTIONS 105 AND 365 OF THE BANKRUPTCY CODE TO ESTABLISH  
PROCEDURES FOR THE SETTLEMENT OR ASSUMPTION AND  
ASSIGNMENT OF PREPETITION DERIVATIVE CONTRACTS**

PLEASE TAKE NOTICE that a hearing (the "Hearing") shall be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court"), on **July 15, 2009 at 10:00 a.m.** (Prevailing Eastern Time), or as soon thereafter as counsel may be heard (the "Hearing") to consider the Motion For Relief From Derivative Procedures Orders And Objection To Debtors' Motion For An Order Pursuant To Sections 105 and 365 of the Bankruptcy Code To Establish Procedures For The Settlement Or Assumption And Assignment Of Prepetition Derivative Contracts filed by

Plaintiffs/Interested Parties, KA KIN WONG, SIU LUI CHING, CHUN IP, JIN LIU, YIN YING LEUNG, LAI MEI CHAN, and SING HEUNG (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the Motion was filed electronically with the Bankruptcy Court [Docket Numbers 3565 and 3566] on May 13, 2009 and was served on all parties who have requested notice in the above referenced chapter 11 cases [Docket Number 3567] on the same day. The Motion may also be examined and inspected by interested parties on (i) the Court’s website (<http://www.nysb.uscourts.gov>) or (ii) Epiq’s website (<http://chapter11.epiqsystems.com>).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Jones Day, 222 East 41st Street, New York, New York 10017 (Attn: Robert W. Gaffey, William J. Hine, and Tracy Schaffer) and Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard P. Krasnow, Lori R. Fife, Shai Y. Waisman, and Jacqueline Marcus), attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004

(Attn: Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin, and Tracy Hope Davis); (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Dennis O'Donnell, and Evan Fleck) and Quinn Emanuel Urquhart Oliver & Hedges, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010 (Attn: Susheel Kirpalani), attorneys for the official committee of unsecured creditors appointed in these cases; and (v) Genovese, Joblove & Battista, P.A., Bank of America Tower At International Place, 100 S.E. 2<sup>nd</sup> Street, Suite 4400, Miami, Florida 33131 (Attn: John H. Genovese, Paul J. Battista, David C. Cimo, and Robert F. Elgidely), attorneys for the Plaintiffs/Interested Parties; so as to be received no later than **July 10, 2009 at 4:00 p.m.** (Prevailing Eastern Time) (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without notice to any creditor or other party in interest other than by announcement of the adjourned date in open court on the date of the Hearing.

Dated: Miami, Florida  
May 20, 2009

Respectfully submitted,

GENOVESE, JOBLOVE & BATTISTA, P.A.

By: /s/ Robert F. Elgidely  
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